

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 JUN 25 PM 1:49

OFFICE OF GENERAL
COUNSEL

MUR # 6847

June 12, 2014

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

VIA FAX AND HAND DELIVERY

**Re: Complaint Against Bob Johnson, Friends of Bob Johnson, LLC,
and Edward L. Shapoff, in his official capacity as Treasurer**

Dear Sir or Madam:

We respectfully file this complaint against Bob Johnson, a candidate for the U.S. House from the 1st Congressional District of Georgia, and Friends of Bob Johnson, LLC, his principal campaign committee, and Edward L. Shapoff, in his official capacity as Treasurer (collectively "Bob Johnson"), for violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission's (the "Commission") Regulations.

Bob Johnson has run afoul of the most basic requirements under the Act and Commission regulations. Not only has Bob Johnson accepted contributions in excess of the legally permissible limits, but in addition Johnson's FEC report is incomplete. This lack of concern for his legally required disclosure is an unfortunate demonstration that Johnson does not take his campaign obligations and the clear rule of law seriously enough to ensure that his activities are fully transparent to the voters of Georgia's 1st Congressional District. In light of his disregard for FEC rules, I hereby request that the Commission initiate an investigation into his campaign activities. If the Commission finds that Bob Johnson has, in fact, violated Federal law regarding the permissible size of campaign contributions, then I respectfully request that you prosecute him to the full extent of the law.

I. Relevant Facts

Based on FEC reports, it appears that Bob Johnson has violated statutory limits by accepting excessive campaign contributions from a donor. Additionally, and contrary to statutory requirements, Bob Johnson has failed to disclose occupation and employer information that would allow the public to evaluate the source of his financial backing.

1. Excessive Contributions.

Based on FEC reports, it appears that Bob Johnson accepted excessive contributions from Ms. Carolyn Blohm in the total amount of \$2,750 for his 2014 primary election. Ms. Blohm donated \$1,500 to Dr. Johnson on December 28, 2013, \$1,000 on June 28th, 2013, and \$250 on April 29th, 2014.

2. Failure to Disclose Occupation and Employer Information.

Based on FEC reports, Bob Johnson accepted a contribution of \$250 from Mr. David Stewart on Oct 22, 2013, and failed to disclose this contributor's occupation and employer information.

II. Legal Analysis

A. Acceptance of Excessive Contributions

Under the Act, individuals may contribute up to \$2,600 per election to a federal candidate; *i.e.*, \$2,600 for the primary election and \$2,600 for the general election. 2 U.S.C. §441a. This limit applies to all individuals, including the members of the candidate's family. Candidates, however, may contribute or loan unlimited amounts to their own principal campaign committee. Based on FEC reports, it appears that Bob Johnson is in violation of this most fundamental contribution limitation by having accepted excessive contributions from Carolyn Blohm totaling \$2,750.

B. Failure to Disclose Occupation and Employer Information

Under the Act, Bob Johnson was legally required to attempt to collect and provide the contributor's full name and address (including zip code), the contributor's occupation and the name of his or her employer, the date of receipt, the amount of the contribution, and the election cycle-to-date total of all contributions from the same individual. 2. U.S.C. § 434(b)(3)(A) and 11 CFR §§ 100.12 and 104.3(a)(4). Based on FEC reports, Johnson may be in violation of disclosure requirements by failing to provide Mr. David Stewart's occupation and name of his employer when reporting his contribution of \$250. This reporting failure deprives the public of the ability to evaluate the corporate and industry sources of Bob Johnson's support.

III. Conclusion


Bob Johnson's reports show a lack of respect for rules and regulations enacted to ensure fairness and accuracy in the election process. Voters in our First District of Georgia deserve a candidate who recognizes the importance of transparency and who takes pride in his campaign obligations—especially when those obligations involve accurately disclosing his campaign's financial activity to the public. Contributions limits like the one here have been upheld by the United States Supreme Court because they prevent corruptions and the appearance of corruption.

Bob Johnson has a legal and ethical obligation to comply with these most basic of campaign finance rules.

In light of the foregoing, we respectfully request that the Commission take steps to immediately investigate Bob Johnson's violations of federal law and regulations outlined above. If the facts are as they appear to be from his FEC reports, then the Commission should find reason to believe that Bob Johnson and his Campaign have violated the Act and the Commission's Regulations. In addition, the Commission should promptly determine and impose sanctions for these legal violations, and enjoin Mr. Johnson and his campaign from any and all campaign finance violations in the future. We also ask that the Commission impose such additional remedies as are necessary and appropriate to ensure compliance and send a message to campaigns that legal rules must be followed in order to provide transparency for the voting public, as well as prevent corruption and the appearance of corruption.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,


Donald J. Tuton

Bloomington, GA 31302

Signed and sworn before me this 13th day of June, 2014


NOTARY PUBLIC

LISA M. ROBERSON
NOTARY PUBLIC
CHATHAM COUNTY
GEORGIA
MY COMMISSION EXPIRES
MARCH 25, 2017